

To Whom it May Concern:

I am opposed to the development and use of Broadband Over Power Lines (BPL) for a number of reasons, and ask that the Commission seriously consider the concerns below, as well as the many other valid concerns that have been expressed by others with regards to this Docket.

As an electrical engineer and a longtime (12+ years) federally licensed Ham Radio operator, it is most apparent to me that BPL will cause harmful interference, not only to the licensed Amateur Radio service, but to many other licensed services that utilize the high-frequency (HF) spectrum where BPL looks to reside. These services include the Military Affiliate Radio Service (MARS), law enforcement, the United States military, the Federal Aviation Administration, FEMA and a host of other government agencies and groups who have been legally licensed to communicate -- by need, as opposed to convenience -- on the HF spectrum.

BPL will degrade these agencies' ability to communicate on HF at the least, or render communications on HF useless at the most for a variety of reasons. First, power lines will be used as the medium to send and receive BPL signals -- the power lines will act as nothing more than antennas, converting the electrical BPL signals to RF, which will result in uncontrolled RF interference throughout the HF spectrum. The American Radio Relay League (ARRL) has spent considerable time and resources documenting this fact in many areas that have rolled out BPL for trial studies. Please refer to the ARRL's findings at <http://www.arrl.org/tis/info/HTML/plc/>

I fail to see any similar studies that have been conducted by the Commission or proponents of BPL, yet proponents claim that interference will not be created by BPL. This claim is simply misleading and incorrect.

Second, the HF spectrum allows communications over great distances (up to and beyond thousands of miles) to be achieved with the use of even milliwatts of radiated power. This fact is proven every day by normal use of the HF spectrum by licensed users/agencies, and is why they choose to communicate on HF frequencies. Because of this positive characteristic of HF frequencies, BPL is bound to not only interfere with local licensed HF users, but also with licensed users who are afar, further damaging the effectiveness of licensed HF communications.

I urge the FCC -- in conjunction with the NTIA --, as a taxpayer and voting citizen, to conduct their own honest technical interference studies before proceeding with the implementation of BPL. The cart cannot be put before the horse with this issue that involves the expense of time, money and resources on both sides of the issue. Communities that are testing BPL at the present time can be used as the interference study test-bed, so the framework for such interference studies is already in place. I also urge the FCC -- in conjunction with the NTIA -- to review why governments in other countries (Japan, etc.) abandoned the use of BPL after believing -- like the FCC -- that BPL in their countries

would serve as a harmless resource, and one of many Internet "silver bullets." Finally, I urge the FCC -- in conjunction with the NTIA -- to provide these findings to the public for its review before any further development of BPL occurs.

While the idea of low cost Internet service that is widely available for public use is definitely novel, BPL is the wrong solution due to its already-proven damaging effects to vital licensed communications on the HF spectrum.

Thank you for your consideration of my comments and concerns.

Respectfully submitted,
Brian Mileschosky
Licensed Amateur Radio callsign N5ZGT